

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**COALITION PLAINTIFFS' SUPPLEMENTAL RESPONSES TO  
DEFENDANTS' SECOND REQUEST FOR PRODUCTION OF  
DOCUMENTS**

In accordance with Rules 26 of the Federal Rules of Civil Procedure, the Coalition for Good Governance, Megan Missett, Ricardo Davis, Laura Digges, and Williams Digges (the "Coalition Plaintiffs"), by and through counsel, hereby supplement their response to Second Request No. 3. CGG will restate the request and its original response and then provide a supplemental response:

**Second Request No. 3:** All communications between you and the following individuals or organizations, or any persons employed by or acting on behalf of such individuals or organizations, which concern or relate to the Litigation or Georgia's Election System, including documents related thereto:

a. L. Lin Wood, Jr.;

- b. Sidney Powell;
- c. Garland Favorito;
- d. VoterGA;
- e. Members of the Arizona State Senate;
- f. Free Speech for People or The North Carolina Chapter of the NAACP; or,
- g. Any candidate on the ballot for election to federal, state, or local office in the 2020 General Election or Primary, or the 2021 Runoff Election.

**Original Response:** CGG objects to this Request as irrelevant and beyond the scope of discovery because any such communications are not relevant to any of the claims or defenses at issue in this case. There is no material relevant fact at issue in this matter that such documents would tend to make more or less likely. Based on this objection, CGG will not produce any documents in response to this Request.

**Supplemental Response:** As to the individuals specifically identified in Second Request 3, CGG restates its objection, but further states that it has never had communications with Sidney Powell, Lin Wood, or members of the Arizona State Senate, or anyone known to be representing those individuals. As to Free Speech for People, CGG adds the additional objection that Susan Greenhalgh, the

Senior Advisor on Election Security for Free Speech for People, is a consulting expert to CGG and accordingly such documents are not discoverable on that basis. As for The North Carolina Chapter of the NAACP, VoterGA , Garland Favorito, or “Any candidate on the ballot for election to federal, state, or local office in the 2020 General Election or Primary, or the 2021 Runoff Election,” CGG does not supplement its response.

Without conceding their responsiveness, discoverability, or relevance of such documents, CGG will produce communications which concern or relate to the Litigation or Georgia’s Election System, with the following individuals who are involved in some capacity with Coffee County: (a) Cathy Latham; (b) Alex Cruce, (c) Ed Voyles, (d) Misty Hampton, (e) Eric Chaney, (f) Scott Hall, (g) Hall Booth Smith attorneys, (i) Coffee County Open Records officer, and (h) Rachel Roberts.

This 27<sup>th</sup> day of September, 2022.

/s/ Bruce P. Brown

Bruce P. Brown

Georgia Bar No. 064460

BRUCE P. BROWN LAW LLC

1123 Zonolite Rd. NE, Ste 6

Atlanta, Georgia 30306

(404) 386-6856

*Attorney for Coalition for Good Governance*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2022, I served a copy of the foregoing  
upon counsel for the Defendants via electronic mail.

/s/ Bruce P. Brown

Bruce P. Brown